

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Myung-Ja Melton

18 CV 8 111 (LLS)

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

AMENDED

Malcolm Shabazz, LP

Covington Realty Services, Inc

Starr Indemnity & Liability Co.

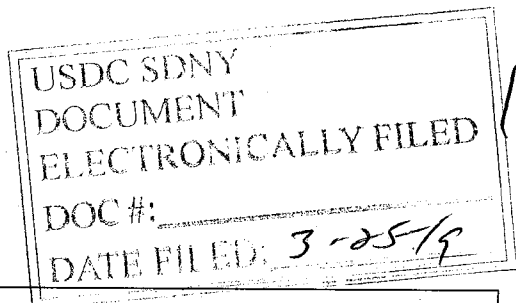
Norych Group, Inc.

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.



NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Civil Rights
groundless lawsuit when evidence is in plain view
and I was readily available to talk if Starr wanted
to talk (I do not know what is the name of the statute for this)

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, Myung-Ja Melton, is a citizen of the State of
 (Plaintiff's name)

New York
 (State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

all corporation *See attached*
The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Myung-Ja *Meiton*

First Name Middle Initial Last Name

104 Lenox Ave #2C

Street Address

NY *NY* *10026*

County, City State Zip Code

(212) 663-1979 *myungja99@aol.com*

Telephone Number Email Address (if available)

Citizenship of defendants

Defendant	incorporated and has its place of business in
Malcolm Shabazz, LP	New York
Covington Realty Services, Inc.	New York
Starr Indemnity & Liability Co.	New York
Norych Group, Inc	Florida

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Malcolm Shabazz, LP
 First Name Last Name
Mujib Mannan - Executive Director
 Current Job Title (or other identifying information)
102 W 116th Street
 Current Work Address (or other address where defendant may be served)
New York NY 10026
 County, City State Zip Code

Defendant 2:

Covington Realty Services, Inc
 First Name Last Name
Shawn Covington - President
 Current Job Title (or other identifying information)
270 West 123rd Street
 Current Work Address (or other address where defendant may be served)
NY NY 10027
 County, City State Zip Code

Defendant 3:

Starr Indemnity & Liability Co.
 First Name Last Name
David Ciotter, Esq. - In-House Att'y
 Current Job Title (or other identifying information)
399 Park Avenue 8 F
 Current Work Address (or other address where defendant may be served)
New York NY 10022
 County, City State Zip Code

The Norych Group, Inc

210 N. University Drive, Suite 802
Current Work Address (or other address where defendant may be served)

Coral Springs, Florida 33071
County, City State Zip Code

Place(s) of occurrence:

Date(s) of occurrence: 2016 / 2017 / 2018.

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

See attached

Facts

I am a federally subsidized tenant residing at 104 Lenox Avenue, #2C, New York, NY owned by Malcolm Shabazz LP and managed by Covington Realty. I am a sole Asian senior citizen housed by Malcolm Shabazz LP.

Since early part of 2015, I have been experiencing plumbing issues in various natures including faulty kitchen sink faucet.

One night in or about first week of January 2016, I came home to find the kitchen sink gurgling and being rapidly filled up with suds and then dark sludge. Sharif Aziz, Super of the building came at my request and said that somebody was using washing machine as he scooped off the sewage from the sink.

Later date he retracted and signed Exhibit C stating that 'no one in the same line had washing machine' in one of perjurious affidavits filed to NYC Civil Court by landlord's attorney Gregory Vail on November 4, 2016.

Frequency of suds/raw sewage backing up increased as time goes by. From every other day to every day to two or three times a day.

On April 15, 2016, raw sewage spewed from kitchen sink and overflowed to fill the undercounter cabinet and on down to floor, and further down to downstairs through the defective subfloor. Entire collection of my possession in under-counter kitchen cabinet was soaked in the sewage which had been backed up from sink. Pots and pans and all other cookeries were filled and covered with dark greasy sludge in the sewage-drenched cabinets at sink. All carted out to trash. I was left with a wreckage infested with germs and bacteria without cooking apparatus. I have been deprived of cooking facilities since the date on.

Landlord remained unresponsive to my repeated request for repair and my demand to restore the unit to a sanitary livable space. I filed complaints in New York City Civil Court for HP action. There was 3-day trial. HPD conducted inspection on August 9, 2016 and June 2, 2017. Upon non-compliance with the HPD order to correct the violations, the agency terminated its share of rent payment.

I requested for replacement of cabinet and HPD inspector also ordered landlord to replace it. Landlord refused while other units in the building were being revamped, one by one, with new cabinets during the same period. Replacing kitchen cabinets is still going on whoever requests, except me. Gregg Vail who represented landlord lied to the court that they didn't make this kind of cabinet anymore so that it cannot be replaced. Also stated that I caused the damage and protected and concealed the wrong-doer tenants by filing perjurious affidavit.

I had surgery on my left wrist about 2 months prior to the night of April 15, 2016 and was still on physical therapy. And I was in the process of searching for another surgeon who would accept

my insurance for a surgery on right arm for torn bicep/fluid, which gave me excruciating pain with movements at certain angle and I was unable to lift anything over 3 pounds. I was not at all in physical condition to handle the havoc to this extent.

Water ran inside the wall which separates bedroom from outside hallway to grow mold and left unrepairable damage on my artwork. Water damage is also in plain view on 3C in the hall way.

Clothing store downstairs has been inflicted water damage numerously. Men came up shouting kicking my door every time the store was hurt. Starr Indemnity is suing me for the damage and adjourned again to July 26, 2019. Except the fact that Starr has communicated with landlord and concurred, no presentation of anything including date of occurrence. *The Norych is agent for Starr,*

Sharif Aziz and men from the store terrorized me in privately and in public. Sharif succeeded in gaslighting me and driving me to belief that I was losing mind.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

As stated in "Facts" eviction proceeding in housing court & Damage suit by State Indemnity are both adjourned to April 12 & July 26, 2019, And I have to meet the deadline of filing Amendment, It is not prudent for me

IV. RELIEF to assess the injuries and relief while State briefly what money damages or other relief you want the court to order.

both cases are still pending, unaware of what the outcome would be.

I would be appreciative if the court appoint me an legal Aid Attorney.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

March 25, 2019
Dated

Myung-Ja
First Name

Aee
Middle Initial

Melton
Last Name

104 Lenox Ave #2c
Street Address

New York
County, City

ny
State

10026
Zip Code

212-663-1979
Telephone Number

Myungja.99@aol.com
Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.